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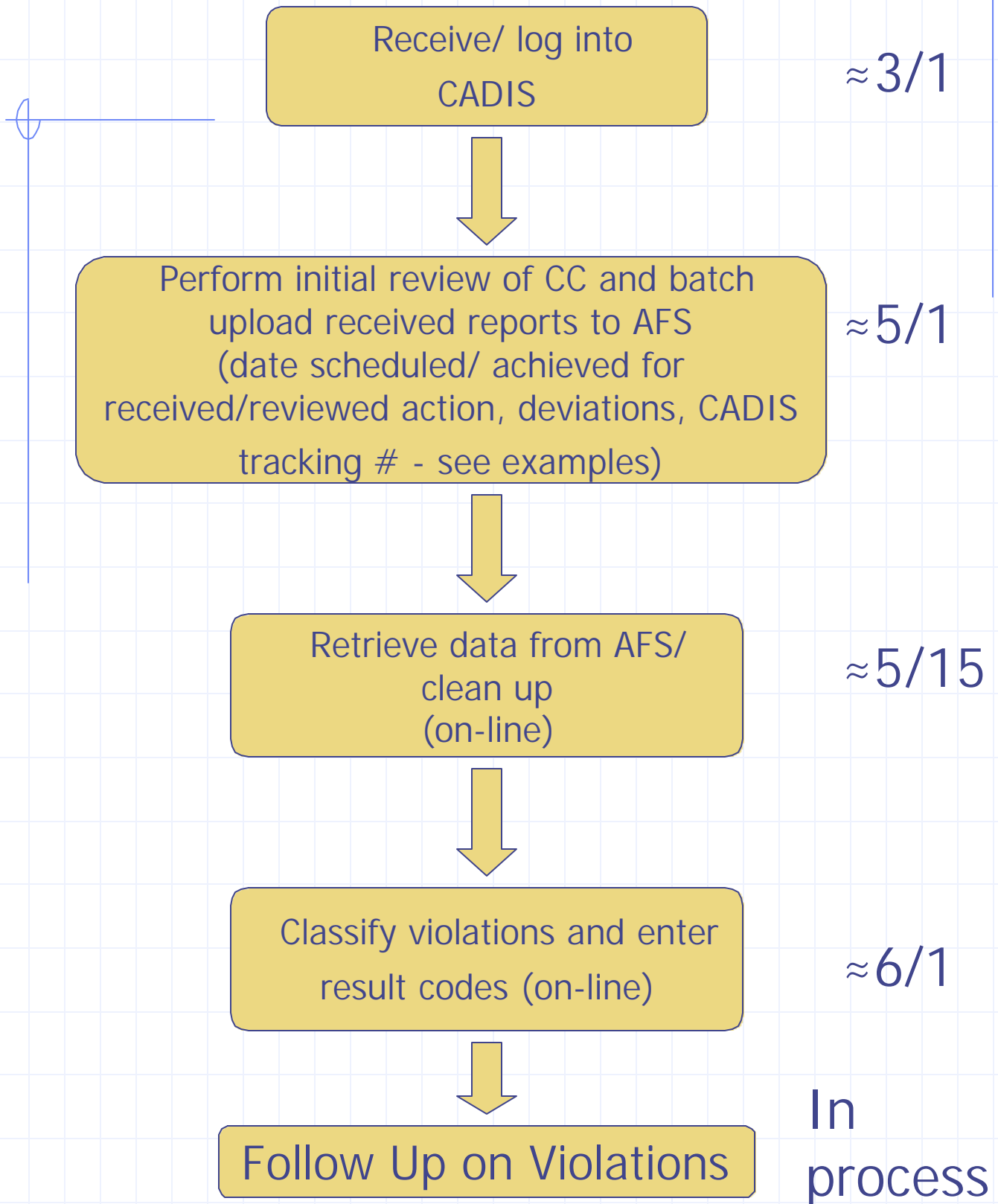
# Title V Compliance Certifications in Connecticut

- ◆ Compliance Analysis Database and Information System (CADIS) is at the heart of the program
- ◆ CADIS (a MS Access dbase) contains:
  - Facility data
  - Permit information (linked to other dbase)
  - Emission units
  - Key enforcement data (NOVs, orders - linked)
  - Key inspection data (linked)
  - AFS Pollutants, Classifications, Programs, etc.
  - Report tracking for all compliance reports
  - Report evaluation forms/ checklists
- ◆ CADIS/ UI used to batch upload report info to AFS

# Universe/ Regulatory Requirements

- ◆ 110 Title V's, 67 issued permits
- ◆ TV regulation modified 3/15/2002
- ◆ Compliance certifications due January 30<sup>th</sup> each year
- ◆ Must include info required by 70.6(c)(5)(iii)
- ◆ Forms published and distributed by DEP

# Connecticut's TV Certification Review Process (2003)



# Step 1- Due/ Rcvd Action (Batch)

3270 Mod 2 Display - A - TCP00043

File Edit View Communication Actions Help

Jump Save Exit Send Recv Copy Paste Person Renap Color Play Macro.. Record Macro.. Stop Macro.. Pause Macro.. Run Appli..

DATE : 06/27/03 AIRS FACILITY SUBSYSTEM - BROWSE PGM: AFP507  
SCREEN: 507 PLANT ACTIONS MAP: AFM5072

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03371 SAINT-GOBAIN PERFORMANCE PLASTICS 407 EAST ST

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ACTION: 029 - TV DUE/RCVD-ST

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KEY ACTION(S) ..... [ 03/05/05 - SAV ]  
AIR PROGRAM CODE(S) .. V  
ACTION TYPE ..... CB ACTION TYPE CATEGORY .....  
DATE SCHEDULED (YYMMDD): 03/01/30 DATE ACHIEVED (YYMMDD) : 03/01/29  
RESULTS CODE ..... RESULTS DESCRIPTION ..  
PENALTY AMOUNT ..... RDE 8 .....  
STAFF NAME .....  
STAFF TITLE .....  
POLLUTANT CODE ..... FACIL CHEMICAL ABSTRACT # .. :  
( FACILITY-WIDE PERMIT REQUIREMENTS )  
CONTRACTOR ID .....  
RDE 16 ..... 20030351  
PRIVATE (Y/N): N

PF1=HELP PF3=END PF4=MAIN PF5=TERM PF7=PREV PF8=NEXT PF12=UPDT

MA + a 23/077

PF1 PF2 PF3 PF4 PF5 PF6 Enter PA1 Attn NewLine  
PF7 PF8 PF9 PF10 PF11 PF12 Clear PA2 SysReq NextPad

134.67.160.1:10023

Due  
Date

CADIS  
Tracking #

Received  
Date

# Step 1 (cont.)

## CC Review Action (Batch)

3270 Mod 2 Display - A - TCP00043

File Edit View Communication Actions Help

Jump Save Exit Send Recv Copy Paste PMScm Rerun Color Play Macro... Record Macro... Stop Macro... Pause Macro... Run Apple...

DATE : 06/27/03 AIRS FACILITY SUBSYSTEM - BROWSE PGM: AFP507  
SCREEN: 507 PLANT ACTIONS MAP: AFM5072

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03371 SAINT-GOBAIN PERFORMANCE PLASTICS 407 EAST ST

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ACTION: 028 - CRT REV BY STAT

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KEY ACTION(S) ..... : [ 03/06/09 - SAV ]

AIR PROGRAM CODE(S) .. : V

ACTION TYPE ..... : SR ACTION TYPE CATEGORY :

DATE SCHEDULED (YYMMDD): 02/12/31 DATE ACHIEVED (YYMMDD) : 03/04/21

RESULTS CODE ..... : MV RESULTS DESCRIPTION : IN VIOLATION

PENALTY AMOUNT ..... : RDE 8 ..... : YY

STAFF NAME ..... : STEVE ANDERSON

STAFF TITLE ..... : APC SUPR

POLLUTANT CODE ..... : FACIL CHEMICAL ABSTRACT # .. :

( FACILITY-WIDE PERMIT REQUIREMENTS )

CONTRACTOR ID ..... : -

RDE 16 ..... : 20030351

PRIVATE (Y/N) : N

SCREEN: 50

PF1=HELP PF3=END PF4=MAIN PF5=TERM PF7=PREV PF8=NEXT PF12=UPDT

MA + a 23/077

PF1 PF2 PF3 PF4 PF5 PF6 Enter PA1 Attn NewLine  
PF7 PF8 PF9 PF10 PF11 PF12 Clear PA2 SysReq NextPad

CADIS  
Tracking #

Review  
Date/  
Deviations

# Step 2 – CC Review Results (On-line)

3270 Mod 2 Display - A - TCP00043

File Edit View Communication Actions Help

Jump Save Exit Send Recv Copy Paste P45cm Rerun Color Play Macro... Record Macro... Stop Macro... Pause Macro... Run Apple...

DATE : 06/27/03 AIRS FACILITY SUBSYSTEM - BROWSE PGM: AFP507  
SCREEN: 507 PLANT ACTIONS MAP: AFM5072

=====

03371 SAINT-GOBAIN PERFORMANCE PLASTICS 407 EAST ST

=====

ACTION: 028 - CRT REV BY STAT

=====

KEY ACTION(S) ..... : ( 03/06/09 - SAV )

AIR PROGRAM CODE(S) .. : V

ACTION TYPE ..... : SR ACTION TYPE CATEGORY :

DATE SCHEDULED (YYMMDD): 02/12/31 DATE ACHIEVED (YYMMDD) : 03/04/21

RESULTS CODE ..... : MV RESULTS DESCRIPTION .. : IN VIOLATION

PENALTY AMOUNT ..... : RDE 8 ..... : YY

STAFF NAME ..... : STEVE ANDERSON

STAFF TITLE ..... : APC SUPR

POLLUTANT CODE ..... : FACIL CHEMICAL ABSTRACT # .. :

( FACILITY-WIDE PERMIT REQUIREMENTS )

CONTRACTOR ID ..... : -

RDE 16 ..... : 20030351

PRIVATE (Y/N): N

SCREEN: 50

PF1=HELP PF3=END PF4=MAIN PF5=TERM PF7=PREV PF8=NEXT PF12=UPDT

MA + a 23/077

PF1 PF2 PF3 PF4 PF5 PF6 Enter PA1 Attn NewLine  
PF7 PF8 PF9 PF10 PF11 PF12 Clear PA2 SysReq NextPad

134.67.180.1:10023

CC Results Code,  
Period End Date

# CC Data in CADIS

Microsoft Access - [Reports Received]

File Edit

### Saint-Gobain Performance Plastics

Client: 7701 Town: 17  
Sequence: 81 Premise: 0071  
AFS ID: 1500502271

Report Information | Title V Compliance Certification

Report Tracking #: 20030251  
AFS Action #:

Company Name: Saint-Gobain Performance Plastics  
Premise Address: 407 East St  
New Haven, CT 06511

Report Name: Title V Compliance Certification  
Permit Number: 012005414

Reporting Time Period: 1/1/2002 to 12/31/2002  
Date Received: 1/29/2003 Date Due: 1/30/2003  
Reviewer: Keith Hill Review Completed: 4/21/2003

Revision Submitted? ☐ Yes ☒ No Addendum Submitted? ☐ Yes ☒ No  
Final Revision Date: Final Addendum Date:

Last Update: 6/16/2003  
Updated By: khl  
Date Created: 2/6/2003  
Created By: khl  
EPA Date:

Print Evaluation Report

Edit [OK] Close Report

Form View FLTR NUM



The screenshot shows a complex, multi-layered Microsoft Access application window titled "Saint-Gobain Performance Plastics". The window is titled "Microsoft Access - [Reports Received]" and contains a form titled "Part VI - Preliminary ERP/Federal HPV Classification".

The form is divided into several sections:

- Deviation/Violations Noted:** This section contains a list of violations, including "Deviation Identified in Compliance Certification" and "Violations to be Closed in Compliance Certification".
- Preliminary HPV Classification:** This section contains a list of classification options, including "SPV (no MDY record)", "SPV (NOV record)", "Possible HPV", "Definite HPV", and "Federal HPV".
- Associated NVs:** This section contains a list of associated NVs, including "Approvable NV" and "Remove NV".
- Federal HPV Criteria:** This section contains a list of criteria, including "General HPV Criteria 1" through "General HPV Criteria 7", "Mandatory Criteria 1" through "Mandatory Criteria 5", and "Mandatory Criteria 6" through "Mandatory Criteria 8".

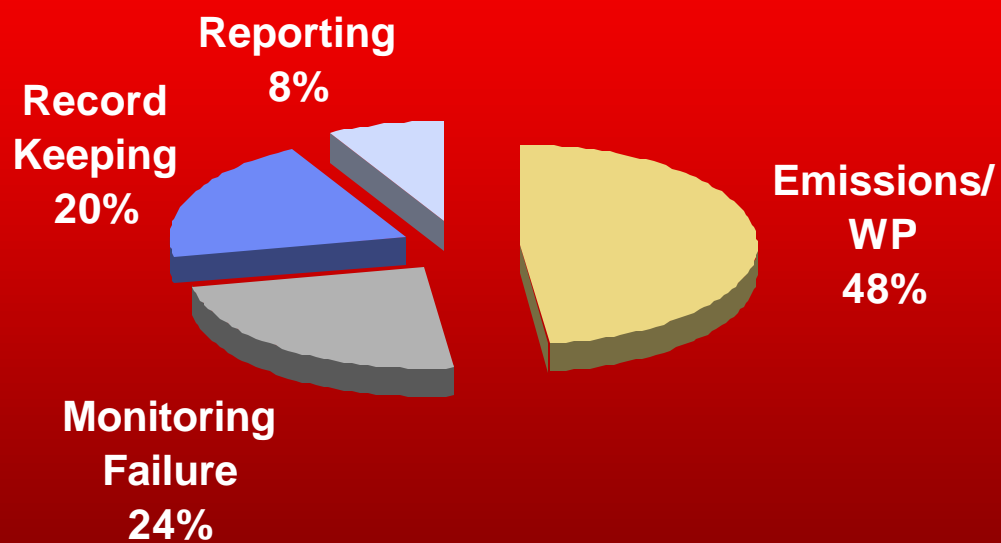
The form also includes fields for "Discovery Date", "Classification Date", and "Date Referred to AG".

The application is running on a Windows operating system, and multiple instances of the "Microsoft Access - [Reports Received]" window are visible in the background.

# What did we find in 2003?

- ◆ Facilities are fixing problems and correcting record keeping while **preparing** reports
- ◆ 85% of CCs submitted by due date
- ◆ 100% submitted by April 1
- ◆ Almost 50% of CC's contained deviations/ violations
- ◆ About 10% may go to formal action
- ◆ Others resolved w/ NOV

# Deviation Breakdown



# Challenges

- ◆ Reports all due on one day is a blessing and a curse
- ◆ Review expectations/ QA
- ◆ Results codes/ expectations
- ◆ Timely & Appropriate Response policy binds us
- ◆ Resources: 1 FTE assigned to review CCs